

WHEREAS, Couch and Respondent Entities admit the Securities Commissioner has jurisdiction in this matter; and

WHEREAS, the Securities Commissioner finds the investor protections and remedies in this Consent Order both appropriate and in the public interest for the protection of the investors and the capital markets of the State of South Carolina.

NOW THEREFORE, IT IS HEREBY ORDERED, and Couch and Respondent Entities consent and agree that:

- A. Couch and Respondent Entities shall immediately cease and desist from transacting business in this State that is in violation of the Act, and in particular, S.C. Code Ann. §§ 35-1-301, 35-1-402, and 35-1-501;
- B. Upon the Commissioner's execution of this Order, Respondent Entities shall pay fifteen thousand dollars (\$15,000) for the cost of the Commissioner's investigation; and
- C. Nothing in this Consent Order is intended (nor should be interpreted) to disqualify Couch or Respondent Entities in any way from reliance on Rule 506 of Regulation D of the Securities Act of 1933, 17 C.F.R. § 230.506(d).

Upon execution by the Securities Commissioner, this Order resolves Administrative Proceeding 12028. This Order should not be interpreted to waive any (i) criminal cause of action, (ii) private cause of action that may have accrued to investors as a result of the Respondents' participation in the activities described in the Order to Cease and Desist, or (iii) other causes of action that may result from activities of Couch and Respondent Entities not detailed therein or which may hereafter arise.

IT IS SO ORDERED this 22 day of September, 2014.

By: 
Alan Wilson
Securities Commissioner
State of South Carolina

WE CONSENT:

Securities Division of the Office of the Attorney General

By: Tracy Meyers Date: 9/19/14
Tracy A. Meyers
Assistant Deputy Attorney General/
Deputy Securities Commissioner

Robert Charles Couch
RC Date: 9/12/2014

Oil2 Holdings, Inc.
By: RC Date: 9/12/2014
(Name) Robert Couch
(Title) CEO

Couch Financial Services Incorporated
By: RC Date: 9/12/2014
(Name) Robert Couch
(Title) President